Management of Solvent-Contaminated Wipes

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Introduction

The Hazardous Waste Program revised its policy on the handling and management of solventcontaminated wipes to reflect the requirements in the Environmental Protection Agency (EPA) rule, *Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes*, in effect on January 31, 2014. The EPA rule allows exclusions from hazardous waste regulation for reusable and disposable solvent-contaminated wipes under certain conditions. The updated program policy described in this guidance will remain in effect until the federal rule is adopted into the NR 600 series hazardous waste rules.

Reusable and disposable wipes are commonly used by businesses and institutions to clean parts and equipment. Through use, the wipes become contaminated with solvents and other materials that could classify them as hazardous waste. This document provides guidance on the proper management and disposal of hazardous solvent-contaminated wipes.

What is a wipe, and when is it eligible for the hazardous waste exclusion?

Wipe means a woven or non-woven shop towel, rag, pad or swab made of wood pulp, fabric, cotton, polyester blends or other materials. To be eligible for the exclusions, a solvent-contaminated wipe must meet one of the following criteria:

- A wipe that, after using or cleaning up a spill, contains one or more of the F001 to F005 solvents listed in <u>s. NR 661.31</u> Wis. Adm. Code, or the corresponding P- or U-listed solvents in <u>s. NR</u> <u>661.33</u>, or exhibits a hazardous characteristic found in <u>subch. C. of ch. NR 661</u> when that characteristic results from a listed solvent, **or**
- A wipe that exhibits only the hazardous waste characteristic of ignitability found in <u>s. NR 661.21</u> due to the presence of one or more non-listed solvents.

Contaminated wipes that contain listed hazardous waste other than solvents or exhibit the characteristic of toxicity, corrosivity or reactivity due to contaminants other than solvents are not eligible for the exclusions. These contaminated wipes (containing listed hazardous waste other than solvents, or exhibiting the characteristics of toxicity, corrosivity or reactivity due to other contaminants) must be managed as hazardous waste. In addition, disposable used wipes contaminated with trichloroethylene are not exempt under this policy or the federal rule, and must be managed as hazardous waste.

Management of Reusable Wipes

Generators of solvent-contaminated wipes sent to be cleaned by a commercial laundry or dry cleaner must meet the following conditions to be exempt under this guidance:

- Store in closed containers, unless wipes are being added or removed. A container is considered to be closed when there is complete contact between the fitted lid and the rim;
- Containers must not be leaking and able to contain free liquids;
- Label containers "Excluded Solvent-Contaminated Wipes";
- Store each container for up to 180 days from start of accumulation before being sent offsite for laundering;
- Prior to transporting offsite, remove free liquids from the wipes before sealing the lid to prevent leaks or emissions. Methods to remove solvents include centrifuging, mechanical-wringing, screen-bottom drums and vacuum extraction. The solvent extract must be managed as hazardous waste;
- Maintain records to confirm the wipes are being managed appropriately, including:
 - The name and address of the commercial laundry receiving the wipes and documentation that the laundry has an approved wastewater treatment system or discharge permit;
 - 2. Document the 180-day accumulation limit is being met; and
 - 3. Document that there are no free liquids in the wipes before being sent offsite to be laundered, using Test Method 9095B (Paint Filter Liquids Test), EPA publication SW-846 or a comparable method.

Management of Disposable Wipes

Generators may send disposable solvent-contaminated wipes, except wipes contaminated with trichloroethylene, offsite for disposal by one of the following methods: (1) being burned for energy recovery at a licensed or permitted hazardous waste incinerator or a licensed or permitted municipal solid waste combustor, or (2) placement in a licensed or permitted solid waste landfill. In order for the wipes to be exempt from hazardous waste regulation, and the disposal methods identified above be considered acceptable, the disposable wipes must meet the following conditions:

- Store in closed containers, unless wipes are being added or removed. A container is considered to be closed when there is complete contact between the fitted lid and the rim;
- Containers used to store used wipes must not be leaking and able to contain free liquids;
- Label containers "Excluded Solvent-Contaminated Wipes";
- Store each container for up to 180 days from start of accumulation before being sent offsite for disposal;
- Prior to transporting the wipes offsite, remove free liquids from the wipes before sealing the lid to prevent leaks or emissions. Methods that may be used to remove solvents include centrifuging, mechanical-wringing, screen-bottom drums and vacuum extraction. The solvent extract must be managed as hazardous waste;
- Use a DNR licensed Solid Waste transporter to ship the wipes offsite;
- Maintain records to confirm the wipes are being managed appropriately, including:
 - 1. The name and address of the hazardous waste incinerator, solid waste combustor or solid waste landfill receiving the wipes;
 - 2. Document the 180-day accumulation limit is being met; and
 - 3. Document there are no free liquids in the wipes before being sent offsite for disposal, using Test Method 9095B (Paint Filter Liquids Test), EPA publication SW-846 or a comparable method.

Note: Generators sending disposable solvent-contaminated wipes to a licensed or permitted solid waste landfill are not allowed to mix the wipes with regular solid waste (e.g., toss them into a solid waste dumpster).

Resources for more information

Environmental Protection Agency (EPA) rule, Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes: http://www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes.htm

EPA Test Method 9095B (Paint Filter Test), EPA publication SW-846: http://www.epa.gov/wastes/hazard/testmethods/sw846/pdfs/9095b.pdf

On-site Solvent Reclamation: A Guide for Hazardous Waste Generators http://dnr.wi.gov/files/PDF/pubs/wa/WA1523.pdf

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